



February 6, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: CTE Telecom, LLC d/b/a Commonwealth Long Distance.
Certification of CPNI Filing (2-6-06)
EB Docket No. 06-36
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers' protection of the privacy of customer proprietary network information ("CPNI"),² CTE Telecom, LLC d/b/a Commonwealth Long Distance., submits the attached Compliance Statement and Certificate.

Respectfully submitted,

J. Christine Feeley
Vice President of Marketing

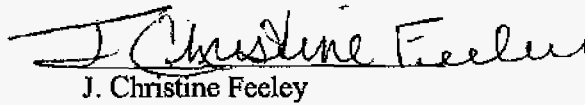
cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
Best Copy and Printing via e-mail fcc@bcpiweb.com

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. § 64.2001, *et seq.*

CERTIFICATION OF CPNI COMPLIANCE - 2006

I, J. Christine Feeley, hereby certify that I am an officer of CTE Telecom, LLC d/b/a Commonwealth Long Distance., with the title of Vice President of Marketing, that I am authorized to execute this certification as an agent CTE Telecom, LLC d/b/a Commonwealth Long Distance.; and that based upon my personal knowledge, I certify that CTE Telecom, LLC d/b/a Commonwealth Long Distance. has established operating procedures, as described in the accompanying statement, that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR §§ 64.2001 through 64.2009.


J. Christine Feeley
Vice President of Marketing

Executed on: February 6, 2006

**CTE TELECOM, LLC d/b/a COMMONWEALTH LONG DISTANCE. ("CLD")
STATEMENT OF CPNI COMPLIANCE PROCEDURES**

CLD is compliant with the FCC's Customer Proprietary Network Information rules and regulations. Specifically, CLD's marketing practices conform to 47 CFR § 64.2005, "Use of Customer Proprietary Network Information Without Customer Approval," as the products and services marketed to existing CLD customers are "among the categories of service" (i.e., local and/or interexchange) "to which the customer already subscribes from the same carrier" and customer approval is therefore not required. In addition, at the initiation of every inbound or outbound telemarketing call, CLD requests customer permission to access the account for marketing purposes.

CLD does not share CPNI with its affiliates in marketing products and services to its customers. CLD also does not sell or share its customer proprietary network information to suppliers, vendors or others for the purposes of marketing non-CLD telecommunications or information services. The CLD marketing department maintains records of all sales and marketing campaigns for a minimum of one year.

When customers initiate contact with questions about products and services, CLD representatives verify that the caller is the authorized customer on the account in question by confirming identity. The customer is then asked for permission to access the account records in order to appropriately address questions.

CLD customer service representatives handling inbound or outbound telemarketing calls are trained on how to handle CPNI, and have written guidelines at their workstation as part of their "Call Guide." The training and guidelines both include the requirement that each customer service representative seek verbal permission to access customer account information from the customer of record on every inbound or outbound call.

CLD has implemented policies that require its employees to protect the confidentiality of CPNI. The policies restrict access to customer records, provide for employee training concerning the authorized and unauthorized use of CPNI, and require the confidentiality of customer records and CPNI. These confidentiality provisions also are outlined in an Employee Code of Ethical Conduct and Employee Code of Criminal Conduct. All employees must verify in writing that they have reviewed, understand and will comply with these policies. Each employee must execute this document on an annual basis, evidencing that they have reviewed, understand and comply with these policies. In addition, a CPNI policy statement has been distributed to the CLD marketing department to ensure compliance with the FCC's CPNI rules in marketing efforts. Employees and agents are expected to act in accordance with all governing State and Federal laws, rules and regulations. As such, the Company has adopted policies, including the Code of Ethical Conduct and the Code of Criminal Conduct, which address but are not limited to instances of employee dishonesty, theft, or unauthorized access and or use of private or confidential information contained in the records of a customer of the Company. Any employees that violate the Code of Ethical Conduct and/or the Code of Criminal

Conduct, including violations for the unauthorized use, sharing or disclosure of CPNI will be subject to disciplinary action, including suspension and possible termination of employment.